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BY ECF

Honorable Vera M. Scanlon, United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Rayne Valentine v. City of New York, et al.* - 21-CV-4867 (EK) (VMS)

Your Honor:

I am Plaintiff's counsel in the above-captioned matter. I write to ask that the Court extend the time under Fed.R.Civ.P. 4(m) for Plaintiff to serve three Defendants with the First Amended Complaint in this matter until one month after defense counsel provides, or Plaintiff otherwise obtains, addresses at which to serve them. The three Defendants in question are NYPD Officer Nasimdzhon Melikov; Sergeant Bill Morrissey; and Detective Raymond Gordon. Those Defendants who are currently represented by the Law Department in this matter consent to this request.

By way of background, following substantial briefing and argument before the Court, the represented Defendants provided the names of certain individuals, including the three Defendants in question, on January 31, 2022, in written initial disclosures. The initial disclosures do not contain addresses for these three Defendants, as Fed.R.Civ.P. 26(a)(1)(A)(i) and Local Civil Rule 26.3(c)(3) require. They are no longer employed by the NYPD. On February 1, 2022, Plaintiff amended the Complaint, *inter alia*, to substitute these three Defendants as parties in place of Doe Defendants who had been named in the Complaint.

Upon information and belief, defense counsel is attempting to obtain and provide the addresses of these three Defendants so that Plaintiff can serve them with the FAC. Plaintiff therefore respectfully asks that the Court extend the time under Fed.R.Civ.P. 4(m) for Plaintiff to serve three Defendants with the First Amended Complaint in this matter until one month after defense counsel provides, or Plaintiff otherwise obtains, addresses at which to serve them. Thank you for your attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver